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7 Attorneys for Specially Appearing  
Defendants RCI HOSPITALITY  
8 HOLDINGS, INC. and CASEY GROVER

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11  
12 JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

13 Plaintiffs,

14 vs.

15 TRAMMELL S. CROW, JR.,  
16 DR. BENJAMIN TODD ELLER,  
RICHARD HUBBARD,  
17 DR. MELISSA MILLER, DR. JOSEPH  
BOLIN, DR. SCOTT WOODS,  
18 DR. MRUGESHKUMAR SHAH,  
MICHAEL CAIN, COE JURACEK,  
19 PHILIP ECOB, H.J. COLE, TEXAS  
RANGER CODY MITCHELL, KURT  
20 KNEWITZ, PAUL PENDERGRASS,  
RALPH ROGERS, ROBERT PRUITT,  
21 SCOTT BRUNSON, CASE GROVER,  
RICHARD BUTLER, MARK  
22 MOLINA, MICHAEL HYNES, JR.,  
SHAWN MAYER, JADE MAYER,  
23 RCI HOSPITALITY HOLDINGS,  
INC., INTEGRITY BASED  
24 MARKETING, LLC, STORM  
FITNESS NUTRITION, LLC, ULTRA  
25 COMBAT NUTRITION, LLC,  
ECOLOFT HOMES LLC, ELÉVATED  
26 WELLNESS PARTNERS LLC, DOE  
INDIVIDUALS 1–20, and DOE  
27 COMPANIES 21–30,

28 Defendants.

CASE NO. 2:22-cv-7957

**STIPULATION TO EXTEND TIME  
FOR DEFENDANT RCI  
HOSPITALITY HOLDINGS, INC.  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE  
THAN 30 DAYS [L.R. 8-3.]**

**Complaint Served: January 23, 2023  
Current Response Date: February 13,  
2023  
New Response Date: February 27,  
2023**

Action Filed: November 1, 2022

CASE NO. 2:22-cv-7957

STIPULATION TO EXTEND TIME FOR DEFENDANT RCI HOSPITALITY HOLDINGS, INC. TO RESPOND  
TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS [L.R. 8-3.]

1 TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 Pursuant to Local Rules 7-1 and 8-3, Plaintiffs Julia Hubbard and Kayla  
3 Goedinghaus (“Plaintiffs”), by and through their counsel, and Defendant RCI  
4 Hospitality Holdings, Inc. (“RCIHH”), hereby stipulate as follows:

5 **RECITALS**

6 WHEREAS, on November 1, 2022, Plaintiffs filed their Initial Complaint in  
7 the above-entitled action. (ECF No. 1.)

8 WHEREAS, on January 23, 2023, Plaintiffs served RCIHH with the  
9 Complaint.

10 WHEREAS, RCIHH’s answer to the Complaint is due February 13, 2023.

11 WHEREAS, RCIHH has been attempting to retain local counsel in California  
12 to represent them in the above-entitled action, and only recently obtained such  
13 counsel.

14 WHEREAS, RCIHH and its California counsel require additional time to  
15 answer or otherwise respond to the Complaint, as well as comply with Local Rule 7-  
16 3.

17 **STIPULATION**

18 IT IS HEREBY STIPULATED, by and between Plaintiffs and RCIHH as  
19 follows:

20 RCIHH shall have up to and including February 27, 2023 to answer or  
21 otherwise respond to the Complaint. This stipulation shall constitute a special  
22 appearance by RCIHH and shall not waive any defenses under Federal Rule of Civil  
23 Procedure 12(b), or relating to personal jurisdiction, forum or venue, consistent with  
24 Section 418.10(d) of the California Code of Civil Procedure.

25  
26 [SIGNATURES FOLLOW ON NEXT PAGE]

27 ///

28 ///

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FACSIMILE (213) 362-7788

1 Dated: February 13, 2023

BALESTRIERE FARIELLO  
KABATECK LLP

3 By: /s/ Matthew W. Schmidt  
4 John G. Balestriere  
5 Matthew W. Schmidt  
6 Anastasia K. Mazzella  
7 Attorneys for Plaintiffs

8 DATED: February 13, 2023

YUKEVICH | CAVANAUGH

9 By: /s/ Justin M. Marvisi  
10 Delmar S. Thomas  
11 Justin M. Marvisi  
12 Olivia H. Kim  
13 Attorneys for Specially Appearing  
14 Defendants RCI HOSPITALITY  
15 HOLDINGS, INC. and CASEY GROVER

**ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)**

16 Pursuant to Local Rule of Civil Procedure 5-4.3.4(a)(2)(i), the filer of this  
17 document attests that all the other signatories listed, and on whose behalf the filing  
18 is submitted, concur in the filing's content and have authorized the filing.

19 DATED: February 13, 2023

YUKEVICH | CAVANAUGH

20  
21 By: /s/ Justin M. Marvisi  
22 Delmar S. Thomas  
23 Justin M. Marvisi  
24 Olivia H. Kim  
25 Attorneys for Specially Appearing  
26 Defendants RCI HOSPITALITY  
27 HOLDINGS, INC. and CASEY GROVER  
28

**PROOF OF SERVICE****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 355 South Grand Avenue, Fifteenth Floor, Los Angeles, CA 90071-1560.

On February 14, 2023, I served true copies of the following document(s) described as **STIPULATION TO EXTEND TIME FOR DEFENDANT RCI HOSPITALITY HOLDINGS, INC. TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS [L.R. 8-3.]** on the interested parties in this action as follows:

**SEE CM/ECF SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 14, 2023, at Los Angeles, California.

/s/ Deanna Castellanos

Deanna Castellanos

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